

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Review of Part 87 of the Commission's Rules)	WT Docket No. 01-289
Concerning the Aviation Radio Service)	
)	

**MOTION OF TERRESTAR NETWORKS INC. TO ACCEPT LATE-FILED REPLY
COMMENTS**

Terrestar Networks Inc. ("Terrestar") respectfully seeks leave to file the attached Reply Comments in response to the Second Further Notice of Proposed Rulemaking ("FNPRM")¹ in the above-captioned proceeding. Terrestar is submitting these Reply Comments on April 6, 2007, one day after April 5, 2007, the day reply comments were due. Terrestar regrets missing the reply comment date by a single day, but because of extremely busy travel schedules of senior management, was not able to finalize these Reply Comments until today.

There is good cause for the Commission to grant leave to ensure that the record is complete. Doing so would ensure that the Commission considers Terrestar's input on the issues raised in the FNPRM. As an important new entrant in the 2 GHz MSS band, Terrestar will be directly impacted by the proposed AMS(R)S services being considered by the Commission, as such services might have a negative effect on Terrestar's

¹ *Review of Part 87 of the Commission's Rules Concerning the Aviation Radio Service*, Second Report and Order and Second Further Notice of Proposed Rulemaking, WT Docket No. 01-289, FCC 06-148 (rel. Oct. 10, 2006).

innovative proposed next-generation integrated mobile satellite and terrestrial communication network. Terrestar submits that granting leave to file the attached Reply Comments will cause no prejudice to any of the interested parties, since a delay of a single day will not keep interested parties from being able to evaluate and, if necessary, respond to Terrestar's Reply Comments.

Accordingly, Terrestar respectfully requests the Commission to grant this motion to accept the attached Reply Comments filed on April 6, 2007.

Respectfully submitted,

TERRESTAR NETWORKS INC.



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